

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

S14 98 Cr. 1023 (LAK)

- v. - :

SULAIMAN ABU GHAYTH, :

a/k/a "Salman Abu Ghayth," :

Defendant. :

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USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/13/14

**GOVERNMENT'S MOTION FOR A WITNESS TO TESTIFY AT TRIAL UNDER A
PSEUDONYM AND OTHER RELATED PROTECTIVE MEASURES**

The United States of America, by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, John P. Cronan, Nicholas Lewin, and Michael Ferrara, Assistant United States Attorneys, of counsel, respectfully moves this Court to enter an Order (1) directing that a witness (the "Witness"), who is identified in the Declaration of John P. Cronan, dated January 31, 2014 (the "Cronan Declaration"), may testify under a pseudonym, without revealing his actual name or address in open court; (2) directing the Government, as soon as practicable after entry of the Order, to provide the defense with any material pursuant to Title 18, United States Code, Section 3500 and *Giglio v. United States*, 405 U.S. 150 (1972), that relate to the Witness; (3) precluding defense counsel from further disseminating the Witness's true name, residence, and any material provided pursuant to Title 18, United States Code, Section 3500 and *Giglio v. United States*, 405 U.S. 150 (1972), to anyone other than members of the defense team, which includes the defendant, co-counsel, paralegals, investigators, translators, litigation support personnel, secretarial staff, and defense experts; (4) precluding courtroom sketch artists from

*Motion denied for
substantially the reasons
stated in your court this
day.*

SO ORDERED

LEWIS A. KAPLAN, USD

2/13/14